

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**RESPONSES OF POSTAL SERVICE WITNESS MARTIN TO NATIONAL  
ASSOCIATION OF PRESORT MAILERS INTERROGATORIES  
(NAPM/USPS-T6-1-4)**

The United States Postal Service hereby provides its response to the above-listed interrogatories of the National Association of Presort Mailers, dated February 17, 2012. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
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**NAPM/USPS-T6-1.** Please refer to page 5 where you discuss the AMP studies and how “[e]ach will require its own evaluation of available transportation, how such transportation should be adjusted, and any consequent increases or decreases in transportation costs.”

a. Please confirm that the transportation to and from mailer facilities (DMUs, Plant Loads, etc...) was considered during this process. If confirmed, please provide a detailed explanation of the data used to determine the amount of volume being currently transported from these locations.

b. Please provide the results from PIR analysis of previous facility closures regarding cost and service impacts to mailers and mail service providers who were affected by transportation changes.

**RESPONSE:**

(a) Confirmed. The information used to determine the amount of volume being transported from these locations is the utilization data which are uploaded to the transportation databases (Surface Visibility or Transportation Information Management Evaluation System). These data, and the method in which they are captured, are discussed in my response to PR/USPS-T6-4.

(b) The results requested by this part (b) of interrogatory NAPM/USPS-T6-1 cannot be provided because PIR analyses do not provide mailer- or service provider-specific information on cost and service impacts resulting from the closure of a facility. However, all routes that provide transportation to and from a mailer’s plant or a detached mail unit are evaluated in the AMP process to determine the impact to the transportation network and to determine whether changes to any route(s) are required due to the consolidation of a mail processing facility. Results from PIR analyses of previous facility consolidations are provided in USPS-LR-N2012-1/NP12.

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**NAPM/USPS-T6-2.** Please refer to page 6 of your testimony where you discuss the transportation network between origin and destination processing plants.

- a. For each pair of originating and destinating processing plants in the current network please provide the total volume of First-Class Automation Letter Mail volume that is moved via the air transportation.
- b. For each pair of originating and destinating processing plants in the current network please provide the total volume of First-Class Automation Letter Mail volume that is moved via surface transportation.
- c. For each pair of originating and destinating processing plants in the current network please provide the total volume of First-Class Automation Letter Mail volume that is moved via other transportation modes.
- d. For each pair of originating and destinating processing plants following the proposed network rationalization please provide the estimated total volume of First-Class Automation Letter Mail volume that will be moved via the air transportation.
- e. For each pair of originating and destinating processing plants following the proposed network rationalization please provide the estimated total volume of First-Class Automation Letter Mail volume that will be moved via surface transportation.
- f. For each pair of originating and destinating processing plants following the proposed network rationalization please provide the estimated total volume of First-Class Automation Letter Mail volume that will be moved via other transportation modes.

**RESPONSE:**

When transporting First-Class Mail volume by air or surface transportation modes, the Postal Service does not distinguish between First-Class Automation Letter Mail and any other type of First-Class Mail. The data responsive to parts (a) and (b) are provided in the spreadsheet titled "Current and Proposed Plant to Plant ADV.xls" filed under Library References USPS-LR-N2012-1/64 and USPS-LR-N2012-1/NP15 under the "Current" tab in the spreadsheet. The data responsive to parts (d) and (e) are provided in the same spreadsheet under the "Proposed" tab. Because all specific modes of transportation fall under two general categories, surface and air, there is no data responsive to parts (c) and (f) of this interrogatory.

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**NAPM/USPS-T6-3.** Please refer to page 7 where you discuss being “[a]ble to reduce the number of plant-to-plant links in the transportation network so that there is only one plant-to-plant link between the remaining two network nodes”

- a. Please confirm whether the reduction in the number of plant-to-plant links is focused exclusively on the network between Postal Service facilities. If not confirmed, please provide a detailed description of the transportation nodes between mailer and mail service provider facilities and the Postal Service plant included in your new network?

**RESPONSE:**

- (a) Confirmed.

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**NAPM/USPS-T6-4.** Please refer to page 12 of your testimony where you discuss being able to, “[c]reate new opportunities for the Postal Service to transport such mail to delivery units and transport collection mail to the processing plant in combined trips, as opposed to separate trips, thereby improving the efficiency of the plant-to-Post Office network.”

- a. Please confirm whether under the proposed network rationalization plan mail ready for delivery will be dropped at the delivery office and the collection mail will be picked up in a single transportation run. If confirmed, please provide a detailed explanation as to when the Postal Service plans to pick up collection mail (i.e., in the early evening as you do today or rather picking it up in the middle of the night or early morning when you drop the delivery mail). If not confirmed, please explain fully.
- b. Please confirm whether the mail cancellation process will remain as it is today. If confirmed, please provide a detailed explanation as to how your transportation network will pick up collection mail and drop carrier ready mail. Will you pick up mail and drop delivery ready mail in late afternoon and early evening? Will you pick up mail and drop delivery ready mail early in the morning?
- c. Please confirm whether the new network will require current DOV (dispatch of value) times to be moved to an earlier time. If confirmed please provide a detailed explanation of how the change in DOV times will this impact the CAT for customers entering commercial mailings. Please also identify locations that will have their CATs moved earlier. If not confirmed, please explain fully.

### **RESPONSE:**

- (a) Partially confirmed. The Postal Service plans to establish single transportation runs that will drop off mail that is ready for delivery and pick up any collection mail that is available at the drop off location (i.e., the delivery office). The Postal Service intends to design the transportation network in a manner that will enable it to pick up collection mail and transport such mail to the appropriate mail processing facility on the same day. Actual times for the drop off and pick up of mail will vary depending on the design of the route. However, the Postal Service intends to design routes in a manner that will ensure that collection mail is delivered to the appropriate mail processing plant prior to the critical entry time for

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**RESPONSE TO NAPM/USPS-T6-4 (CONT.):**

cancellation and outgoing processing on the day of acceptance (i.e., “Day Zero”).

- (b) My understanding is that the cancellation process will remain the same under the rationalized network. Please see my response to NAPM/USPS-T6-4(a).
- (c) Because the transportation network is not finalized, I am unable to confirm whether new network will require current DOV (dispatch of value) times to be moved to an earlier time. However, under the proposed rationalized network, the Postal Service will continue to ensure that DOVs and Critical Acceptance Times (CATs) are appropriately aligned so that business mailings will be transported to the appropriate mail processing facility by the Day-Zero critical entry time.